

United States
Department of the Interior
Bureau of Land Management

Miles City Field Office

SM Energy Company
Flaring

Determination of NEPA Adequacy
DOI-BLM-MT-C020-2013-0191-DNA

For Further Information Please Contact:

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BLM



Worksheet
Documentation of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management (BLM)

BLM Office: Miles City Field Office

NEPA Number: DOI-BLM-MT-C020-2013-191-DNA

Case File/Project No:

Proposed Action Title/Type: SM Energy Co. Flaring of Non-Economic Gas

Location/Legal Description: Deschamp 13-9, SWSW Section 9, T27N-R57E,
Baker 1-9, NENE Section 9, T28N-R58E
Roosevelt County, Montana

A: Description of the Proposed Action: The proposed action is to continue the flaring of non-economic casing head gas produced by the Deschamp 13-9 and the Baker 1-9 oil wells.

Applicant: SM Energy Company
County: Roosevelt County, Montana
DNA Originator: Paul Helland

B. Land Use Plan (LUP) Conformance

LUP Name* N/A Date Approved

Other document** Earthworks EA for the Deschamp 13-9 Date Approved 11-13-2007

**List applicable LUPs (for example, resource management plans; activity, project, management, or program plans; or applicable amendments thereto)*

The BLM does not write surface NEPA documents for resources on Indian Reservations. That responsibility belongs to the Bureau of Indian Affairs. Therefore, there is not a BLM LUP for this proposed action. This DNA documents the BLM's review regarding the down hole portion of this action and is tiered to the NEPA document that was signed by the BIA-Fort Peck office for the above well.

☐ The proposed action is in conformance with the applicable LUPs because it is specifically provided for in the following LUP decisions:

☐ The proposed action is in conformance with the LUP, even though it is not specifically provided for, because it is clearly consistent with the following LUP decisions (objectives, terms, and conditions)

C. Identify applicable National Environmental Policy Act (NEPA) document(s) and other related documents that cover the proposed action.

EA prepared by BIA for the Deschamp 13-9 APD dated 11-13-2007, pages 7, 8, 17, and 18.

D. NEPA Adequacy Criteria

- 1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?** Yes, this type of impact is discussed in the referenced EA on pages 17 and 18 for the Deschamp 13-9 APD. These two wells produce small amounts of gas (approximately 4 mcf/d) and the entire volume is typically used to operate production equipment. In the event that gas production increases, the remaining portion of the produced gas would be flared.
- 2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, resource values?** The proposed action is not new. The proposed action is a request to continue flaring casing head gas that is not needed to operate production equipment. The current circumstances and alternatives are similar to the situation analyzed in the referenced EA. The alternatives are to continue the flaring of casing head gas or no action (not approve the continued flaring of gas). If this gas is not flared, the wells cannot produce oil because it is not economical to install the infrastructure needed to market the volume of gas not used to operate production equipment.
- 3. Is the existing analysis valid in light of any new information or circumstances (such as rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstance would not substantially change the analysis of the new proposed action?** Yes, the existing analysis is valid. The action is in the same airshed analyzed in the referenced EA and circumstances have not significantly changed regarding air quality in the area.
- 4. Are the direct, indirect and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?** Yes, the effects are similar to the situation analyzed in the referenced EA. Also, this action is ongoing and is not a new action.
- 5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?** Yes, other appropriate agencies are involved. When the operator has royalty related approval to flare or vent from the BLM, the Conditions of Approval to vent or flare state, "This approval does not constitute approval via permit or rule to vent gas from the Oil and Gas Conservation Division, Department of Natural Resource and Conservation of the State of Montana or the Air Quality Division, Montana Department of Health and Environmental Sciences. Venting and flaring cannot occur unless it is in compliance with the aforementioned agencies' permits and administrative rules." Thus other agencies relevant to this action are involved as required.

E. Interdisciplinary Analysis: Identify those team members conducting or participating in the preparation of this worksheet.

<u>Name</u>	<u>Title</u>	<u>Resource Represented</u>	<u>Initials & Date</u>
Paul Helland	Petroleum Engineer	Minerals	PH 8-8-13
David Breisch	Assistant Field Manager	Minerals	DJB 8/8/13



8/13/2013

Environmental Coordinator

Date

F. Mitigation Measures: List any applicable mitigation measures that were identified, analyzed, and approved in relevant LUPs and existing NEPA document(s). List the specific mitigation measures or identify an attachment that includes those specific mitigation measures. Document that these applicable mitigation measures must be incorporated and implemented.

Please see attached COAs.

CONCLUSION

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Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of NEPA.

Note: If one or more of the criteria are not met, a conclusion of conformance and/or NEPA adequacy cannot be made and this box cannot be checked.



8/14/2013

Todd Yeager
Field Manager
Miles City Field Office

Date